

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

*IN RE CATTLE AND BEEF ANTITRUST
LITIGATION*

Case No. 20-cv-1319 (JRT/HB)

This Document Relates To:

All Actions.

**DECLARATION OF DANIEL O. HERRERA IN SUPPORT OF MOTION TO
COMPEL THE PRODUCTION OF DATA AND DOCUMENTS**

I am an attorney with Cafferty Clobes Meriwether & Sprengel LLP, Interim Co-Lead Counsel for the Cattle Plaintiffs. I am admitted to practice in the District of Minnesota for purposes of this matter under this District's pro hac vice procedure, and I am a member of the bar of the State of Illinois. I submit this Declaration in Support of Plaintiffs' Motion to Compel Documents, filed herewith. I am fully familiar with the facts set forth herein and could, and would, testify to them if called upon to do so.

1. Attached hereto are true and accurate copies of the following exhibits:

| Exhibit | Description |
|----------------|---|
| A | All Plaintiffs' First Set of Requests to All Defendants for the Production of Documents and Electronically Stored Information, tendered on January 11, 2022 |
| B | [FILED UNDER SEAL] Letter from Holly Horrell to Daniel Herrera, dated July 1, 2022 |
| C | [FILED UNDER SEAL] Cargill Defendants' Objections and Responses to All Plaintiffs' First Set of Requests to All Defendants for the Production of Documents and Electronically Stored Information |

| | |
|---|--|
| D | [FILED UNDER SEAL] Letter from Daniel Herrera to Holly Horrell, dated July 15, 2022 |
| E | [FILED UNDER SEAL] Letter from Holly Horrell to Daniel Herrera, dated July 13, 2022 |
| F | [FILED UNDER SEAL] Letter from Ulrike Connelly to Plaintiffs' Counsel, dated July 8, 2022 |
| G | [FILED UNDER SEAL] Letter from Sami Rashid and Patrick Brookhouser to Daniel Herrera, dated May 18, 2022 |
| H | [FILED UNDER SEAL] The parties' Proposals, Responses and Replies for the definition of "Beef" |
| I | Cattle Plaintiffs' First Requests to All Defendants for the Production of Documents and Electronically Stored Information, tendered on June 19, 2020 |
| J | Consumer Plaintiffs' First Requests to All Defendants for the Production of Documents and Electronically Stored Information, tendered on June 19, 2020 |
| K | DPP Plaintiffs' First Requests to All Defendants for the Production of Documents and Electronically Stored Information, tendered on October 15, 2021 |
| L | [FILED UNDER SEAL] Email from Daniel Herrera to Andrew Mollard, dated July 21, 2022 |
| M | [FILED UNDER SEAL] Email from Eddie Hasdoo to Daniel Herrera, dated July 20, 2022 |
| N | [FILED UNDER SEAL] Letter from Barry Stratford to Daniel Herrera, dated July 14, 2022 |
| O | [FILED UNDER SEAL] Letter from Ulrike B. Connelly to Plaintiffs' Counsel, dated May 18, 2022 |
| P | [FILED UNDER SEAL] Letter from Holly Horrell to Daniel Herrera, dated May 18, 2022 |
| Q | [FILED UNDER SEAL] Letter from Holly Horrell to Daniel Herrera, dated July 13, 2022 |

| | |
|---|---|
| R | [FILED UNDER SEAL] March 29, 2022 letter from Daniel Herrera with proposed definitions |
|---|---|

I declare under the penalty of perjury that the forgoing is true and correct.

Executed on July 21, 2022.

/s/ Daniel O. Herrera

CERTIFICATE OF SERVICE

I, Daniel O. Herrera, hereby certify that on July 21, 2022, I caused the foregoing to be filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the email addresses denoted on the Electronic Mail Notice List.

/s/ Daniel O. Herrera